



STATE OF VERMONT
DEPARTMENT OF EDUCATION
120 State Street
Montpelier, VT 05620-2501

June 30, 2006

Henry L. Johnson, Assistant Secretary
United States Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-6200

Dear Assistant Secretary Johnson:

Your letter of May 12, 2006 requested that the Vermont Department of Education submit a revised plan that details the steps the State Education Agency (SEA) and Local Education Agencies (LEAs) will take to ensure that all core area classes are taught by educators who are highly qualified for their assignments in 2006-2007 and beyond. You also requested that this plan specify how the SEA will ensure that poor and minority students are not disproportionately taught by teachers who are not highly qualified for their assignments, and that the SEA describe its process for phasing out its use of the HOUSSE.

This letter is submitted in response to your request. The elements of our revised plan include:

Technical Assistance

1. The SEA has and will continue to provide technical assistance to LEAs in meeting teacher and paraprofessional HQT and HQP requirements through on-site visits, phone and email conferencing and communication, and printed information posted on the VT Department of Education's Web site and provided via US mail. In addition, SEA staff will continue to make presentations regarding HQT and HQP at statewide conferences relevant to administrators and educators. (As examples, please see the attached chart of Accountability Requirements and sample LEA-level HQT data report.)
2. The SEA has and will continue to provide technical assistance by phone, e-mail, and in person to individual educators regarding HQT requirements, their individual HQT status, and what they may need to do to become HQT for their endorsements.

3. The SEA has and will continue to collaborate with providers of professional development (including the Higher Education Collaborative, the Regional Education Services Agencies, The Vermont Institutes, and the Institutions of Higher Education) to identify areas of need for professional development in order for individuals to meet HQT requirements and to preapprove course offerings for HQT purposes.

HQT Determination Process

4. The SEA has and will continue to review the academic credentials of all applicants for licensure or additional endorsement(s) to determine HQT status for each core area endorsement held. This information is communicated directly to the educator and is provided to the educator's administrator, upon request. All endorsements issued after June 30, 2006 will be subject to "New Teacher" HQT content knowledge requirements. (See the charts of HQT licensure and content knowledge requirements on the state's Web site at www.state.vt.us/educ/new/html/licensing/hqt.html.)

Accountability and Public Reporting Requirements

5. Beginning with the FY 2006 application, the SEA will require LEAs to sign assurances on the Consolidated Federal Programs application stating the following:
 - *"The LEA assures that all teachers of core academic subjects (as defined by NCLB) are highly qualified (HQT) for their assignments, or that individual plans are in place to ensure that each teacher who is not HQT for his/her assignment will become so, and that records are available to support this assurance.*
 - *"The LEA assures that HQT parental "right to know" and non-HQT parental notification letters are being sent in a timely manner, when required, as stipulated under NCLB and that records are available to support this assurance."*
 - *"The LEA assures that all instructional paraprofessionals supported with Title I funds meet NCLB paraprofessional requirements and that records are available to support this assurance."*
6. Until an LEA has met the requirement that 100 percent of its core area classes are taught by teachers who are highly qualified for their assignments, it will be required to maintain individual plans describing its efforts to support each educator who is not HQT for his/her assignment to attain HQT status. These efforts may include:

- providing financial assistance to the educator to acquire additional content coursework/professional development/testing in his/her endorsement area,
- providing financial or other assistance to the educator to acquire the coursework/professional development/testing to qualify for an additional endorsement, or
- restructuring the assignment to match the educator's qualifications.

This requirement will continue to be effective whenever the percentage of the LEA's core area teachers who are not HQT for their assignments is less than 100 percent in any given year.

7. As part of its Title I monitoring process, the SEA will ascertain that:

- the LEA is maintaining these individual plans,
- the LEA is complying with the parental notification and paraprofessional requirements,
- data are being collected regarding the annual progress made by the LEA to ensure that 100 percent of its core subject teachers are HQT for their assignments, and
- the LEA is reporting required HQT data annually to the community (see #8 below).

(Please see Title I monitoring document attached.)

8. The SEA will provide data from the previous school year to each LEA on the percentage of its core subject classes taught by teachers who are highly qualified for their assignments. These will be provided for the LEA as a whole, as well as a comparison of the high and low poverty schools within the LEA, if applicable, and for each school within the LEA. In addition, the SEA will provide to the LEA data on the number and percentage of emergency licensed teachers in the LEA and in each school within the LEA. These data will be provided to the LEAs in January of each school year. (Please see sample LEA-level HQT data report attached.)
9. The SEA will report on its Web site statewide data (from the previous school year) on the percentage of core area classes taught by "highly qualified" teachers statewide. These data will be broken out by high and low poverty elementary and secondary schools. The SEA will also report the statewide emergency licensure data on its Web site.
10. Beginning with the spring of 2006, the LEA must report to all parents and broadly within the school community the data on the percentage of classes that are taught by teachers who are NOT "highly qualified" for their assignments and percentage of emergency licensed teachers. These data must be reported by school and for the LEA as a whole (both aggregate and high vs. low poverty, if applicable). These

data should be included in an annual school report or other similar publications where student assessment data is presented. In addition, if the LEA maintains a website, this information should be published on its website.

11. The SEA will require each LEA to set Annual Measurable Objectives for increasing its percentage of core area classes taught by teachers who are highly qualified for their assignments.

Paraprofessional Requirements

12. The SEA has and will continue to collect data annually on the percentage of Title I funded instructional paraprofessionals who meet the NCLB paraprofessional requirements. The SEA will continue to require that in Title I schools, LEAs may only employ new instructional paraprofessionals who meet the HQT requirements. LEAs have also been repeatedly notified that beyond June 2006 they may not continue to employ in Title I funded positions any instructional paraprofessional who is not HQT. Compliance with this requirement will be monitored as noted above in numbers 5 and 7.

Analysis of HQT Data

13. Using its 2004-2005 data, the SEA has done an analysis to determine which core areas have the lowest percentage of classes being taught by teachers who meet HQT requirements for their assignments. This analysis indicates that in only five content areas is the percentage of classes taught by HQT teachers below 80 percent – general social studies, economics, reading, Latin (only 33 classes), and general science. Because Vermont has generalist science and social studies endorsements, we have a number of instances where educators meet (indeed far exceed) the content knowledge requirements for one or more of the subject areas encompassed by the endorsement (such as history or biology) but not for every area. The SEA advises educators regarding the additional coursework or testing that is necessary to enable them to meet HQT content knowledge requirements for all the science or social studies areas. In the area of reading, the problem is accounted for primarily by individuals who are teaching reading with endorsements that do not cover either the content area or grade levels of their assignments. We are working with their administrators to ensure that each teacher of reading carries one of the endorsements considered “appropriate” for this assignment, and that his/her endorsement matches the grade level(s) he/she is teaching (see #14 below).

While, overall, a very small number of educators still need to take additional coursework, testing, or professional development to meet HQT content knowledge requirements (see above), the primary cause of an educator being not-HQT for his/her assignment is an out of subject area or grade level (i.e. “out of field”) assignment. In 2004-2005, over 75 percent of non-HQT classes were taught by teachers who were not properly endorsed for that assignment. The SEA is working with the LEAs to

identify and rectify each instance of a mismatch between educator endorsement status and assignment. (Please see sample LEA-level HQT data report attached.)

Equity Plan

14. Using its 2004-2005 data, the SEA has conducted analyses of the relationship between HQT status (i.e., percentage of classes taught by teachers who are HQT for their assignments) and the following variables – school poverty status, school minority status, and status as a school or LEA identified as in need of improvement. Based upon these analyses, the SEA determined that in Vermont, for regular education classrooms, there is no “unreasonable” (i.e., 5 percent or greater) discrepancy between HQT status and any of these three sets of measures. (Please see attached Addendum.)
15. In situations where special educators are providing “primary instruction” in a core content area (i.e., special education “classes”), there is a discrepancy. However, it is IN FAVOR OF poor students in both elementary and secondary schools. (Please see attached Addendum.)
16. Based upon these analyses, the SEA does not believe that separate actions are required to ensure equity at this time. The actions the State is taking to ensure that 100 percent of core classes are taught by teachers who are HQT for their assignments will benefit all students, including poor and minority students and students attending schools identified as in need of improvement.

If any further information or clarification is required, please contact Marta Cambra, Director of the Educator Quality Team, at (802) 828-6543 or at martacambra@education.state.vt.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard H. Cate". The signature is fluid and cursive, with the first name "Richard" being more prominent.

Richard H. Cate
Commissioner of Education

Addendum

The percentage of classes taught by highly qualified teachers by high poverty elementary schools versus low poverty elementary schools, high poverty secondary schools versus low poverty secondary schools, high minority schools versus low minority schools, schools identified for improvement versus schools not identified for improvement (both at the school and district levels).

Percentage of “core area” regular education classes being taught by a teacher who is HQT for that assignment by School level/ poverty, minority, and AYP (school and district)

High poverty elementary schools	87.83%
Low poverty elementary schools	87.05%
High poverty secondary schools	87.51%
Low poverty secondary schools	91.74%
High minority schools	90.26%
Low minority schools	85.90%
Identified schools in need of improvement	90.63%
Schools not identified in need of improvement	88.15%
Identified districts in need of improvement	89.51%
Districts not identified in need of improvement	88.22%

Percentage of “core area” special education assignments being taught by a teacher who is HQT for that assignment by School level/ poverty, minority, and AYP (school and district)

High poverty elementary schools	83.96%
Low poverty elementary schools	73.83%
High poverty secondary schools	75.18%
Low poverty secondary schools	40.81%
High minority schools	67.28%
Low minority schools	67.85%
Identified schools in need of improvement	73.01%
Schools not identified in need of improvement	65.97%
Identified districts in need of improvement	74.67%
Districts not identified in need of improvement	65.37%

Poverty measure: Free/ Reduced meals were used as a measure for poverty. High/low poverty defined by upper and lower quartiles.
Minority measure: Percentage of students reported as being white was used as a measure for minority. High/low minority defined by upper and lower quartiles.